



THE STATE OF TENNESSEE  
**TENNESSEE EMERGENCY MANAGEMENT AGENCY**  
EMERGENCY OPERATIONS CENTER  
MILITARY DEPARTMENT OF TENNESSEE  
3041 SIDCO DRIVE, P.O. BOX 41502  
NASHVILLE, TENNESSEE 37204-1502  
(615) 741-0001

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

**WP Docket No. 07-100**

The Tennessee Emergency Management Agency (TEMA) hereby files comments on Docket 07-100.

*Comments on Section II. A. 4 – Paging on Public Safety VHF Frequencies*

For many years, TEMA has suffered from paging interference on our VHF statewide radio system from paging stations in other states. Complaints to the FCC provided no relief from the interference. The worst paging interference has been to our and other State operated VHF repeater input channels that are suppose to be limited to mobile only operations, but agencies have been able to license operations for base stations (FB) and mobile relay (FB2) and page over these systems. Sometime we were able to identify the source in places such as Baton Rouge, LA, in Illinois near St. Louis, the State of GA statewide paging system on a mobile only channel as well as other places hundreds of miles away. Some interference has been mitigating by identification of the source and working together to find solutions.

TEMA would like to encourage the FCC to eliminate the paging on the VHF spectrum so that interference could be reduced, but do not think it is practical at this time unless the FCC creates some paging only spectrum. Many public safety agencies, most of which are volunteer departments, use the same base or repeater station for both voice and paging because of very limited budgets. The paging interference is worse in the VHF band since it is so congested, there are no paired frequencies and can propagate for great distances. The problem also exists in the UHF band but is not as prevalent since there is less PS spectrum and UHF has paired channels.

Frequency Coordinators should be the first line for mitigation of paging or other RF interference. Designated "Mobile Only" channels should not be used for paging systems (FX, FB, FB2) nor should designated "Mutual Aid" nor interoperability channel be used for paging and suggest a restriction on paging on these channels should be considered.

*Comments on Section II. A. 7 – Cross-Banding*

We agree with the FCC on this section.

*Comments on Section II. A. 12 – Transit Systems and Toll Roads*

Public Safety spectrum is congested enough already without opening the spectrum to other users. TEMA request the FCC NOT amend the rules for their private system operators, but allow PS Agencies to enter into Frequency Usage Agreement with these entities. This would be more beneficial if the contract changes to another provider, the system would

already be in place and the new contractor will not have to deal with the spectrum / FCC licensing issues.

*Comments on Section II. A. 14 – Industrial/Business Pool Eligibility*

TEMA agrees with the FCC on this issues and supports NPSTC's comments on surveying operations.

*Comments on Section II. B. 19 – 4.9 GHz Band*

TEMA agrees with the intent of clarification of the rule. When Region 39 submitted the 4.9 GHz Plan to the FCC, our understanding of 'secondary' was like the following example.

If a 4.9 GHz device is operating in a fixed mode "talking to another "fixed" device then connect to a mobile 4.9 GHz device, that would be primary operation. If it is a 4.9 GHz device connected to non 4.9 GHz device such as a VHF, UHF, 700, or 800 control station, base or mobile relay, then it is operating more like a microwave link and should be considered "Secondary".

For reading this proposed section several time, we conclude our example is the intend and can support this recommendation.

TEMA thanks the FCC for being proactive and trying to keep the Rules as current and up to date as possible.

Respectfully Submitted,

John W. Johnson  
Radio System Analyst